

# **EXHIBIT A**

## James Mitchell

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**From:** Rahebi, Bitra <BRahebi@mofo.com>  
**Sent:** Monday, May 20, 2024 5:49 PM  
**To:** Christopher Lee  
**Cc:** Dan Gjorgiev; Malloy, Ryan J.; Kiaei, Nima I.; Specht, Silvia T.; Ashley LaValley; Brian Haan; James Mitchell; ppeden@bwslaw.com; David Sheikh; Hung, Richard S. J.; Lee, Rose S.; Park, Soo J.  
**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935:

Hi Chris,

Apple does not oppose MPH moving for this request. Please include the following statement in MPH's motion: "Apple defers to the Court's preference on this issue. In view of its familiarity with this case, the patents, and MPH's prior motions, Apple believes that the Court is well equipped to resolve the pending discovery disputes."

Bitra

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**From:** Christopher Lee <clee@leesheikh.com>  
**Sent:** Friday, May 17, 2024 6:44 AM  
**To:** Rahebi, Bitra <BRahebi@mofo.com>  
**Cc:** Dan Gjorgiev <dgjorgiev@leesheikh.com>; Malloy, Ryan J. <RMalloy@mofo.com>; Kiaei, Nima I. <NKiaei@mofo.com>; Specht, Silvia T. <SSpecht@mofo.com>; Ashley LaValley <alavalley@leesheikh.com>; Brian Haan <bhaan@leesheikh.com>; James Mitchell <jmitchell@leesheikh.com>; ppeden@bwslaw.com; David Sheikh <dsheikh@leesheikh.com>; Hung, Richard S. J. <RHung@mofo.com>; Lee, Rose S. <RoseLee@mofo.com>; Park, Soo J. <SPark@mofo.com>  
**Subject:** Re: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935:

### External Email

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Dear Bitra:

In the interest of moving this case along, MPH intends to ask the Court to refer all pending and future discovery motions to a magistrate judge, and hopes that the parties can jointly seek the referral in a stipulated motion. Please let us have Apple's position on this.

Thanks.

Chris

Sent iPhone

On May 9, 2024, at 12:14 PM, Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)> wrote:

You don't often get email from [brahebi@mofo.com](mailto:brahebi@mofo.com). [Learn why this is important](#)

Dan, we will move things around for Monday and make it work. What time?

**From:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>

**Sent:** Thursday, May 9, 2024 10:09 AM

**To:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

### External Email

Bitra,

Thank you for weighing in. We don't understand your comment that MPH's request for information "is not consistent with ND Cal. practice." Up until Apple's most recent request for a meet-and-confer to be held on April 22, 2024, it *had* been Apple's practice to identify and explain any issues it was having with MPH's responses before requesting that the parties meet and confer. And, as we explained in our April 26, 2024 letter, the parties' April 22, 2024 meet-and-confer—of which you were not a participant—was not a productive use of the parties' time or sufficient under the Court's Civil Standing Order with respect to Apple's discovery requests because Apple did not make a good faith effort to resolve any alleged dispute between the parties. Apple provided little to no information about why it believed MPH's responses were deficient and merely rushed to declare an "impasse" where MPH was seeking explanations about Apple's similarly overbroad discovery requests. To date, Apple has yet to respond to MPH's April 26, 2024 letter and provide the requested explanations. We have no reason to believe that this latest request for a meet-and-confer will be any different, and we are simply trying to avoid another inefficient discussion that wastes MPH's time and resources.

The fact of the matter is, Apple's email requests go *far* beyond what the Order re Discovery of ESI permits, and Apple has not explained why it is entitled to discovery beyond what is permitted. For example, Apple has proposed seven search terms for two of MPH's custodians, but it was Apple that insisted on the limit of five search terms per custodian per party. See Apple's May 22, 2023 draft. As you may recall, Apple's position throughout the litigation has been that email discovery should be as limited as possible, if not foreclosed altogether. Relatedly, the Order re Discovery of ESI requires that "Email production requests shall only be propounded for specific issues, rather than general discovery of a product or business." Now, Apple has served broad requests such as "All emails related to any Asserted Patent or Related Patent" and proposed search terms such as "patent!" for emails spanning nearly 23 years, which capture a significant number of privileged communications including those with prosecution counsel. Apple evidently has an "issue" with MPH's privilege objection, but refuses to explain why. Apple also should explain prior to any meet-and-confer why its request that the emails of MPH's litigation counsel be searched using three separate search terms, including the extraordinarily broad search terms of "patent!" and "licen!," is reasonable, permissible under the ESI Order, or even justified by any caselaw.



We are not available to meet and confer today or tomorrow, but can be available early next week. Again, it would be helpful if Apple provides its explanations and an updated search term proposal prior to any meet-and-confer, rather than simply ignoring MPH's objections. For the avoidance of doubt, we did not and do not condition the meet-and-confer on the citation of authorities for every single issue as you suggest, but a citation of authorities is clearly necessary if Apple continues to pursue certain requests. We are trying to work with you, and we do not believe that the Court would consider our request unreasonable.

Best,

**Dan Gjorgiev**

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**From:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>

**Sent:** Wednesday, May 8, 2024 4:29 PM

**To:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[cleee@leesheikh.com](mailto:cleee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

Dan, this is not consistent with ND Cal. practice. Let's get our collective teams on a call and see if we can iron out the issues we are having with MPH's responses. There is no requirement that we identify authority for every single issue.

I disagree with the rest of your characterizations but let's move on.

We've passed the Wednesday time, but does the offered window Thursday at 9:30 a.m. to 1:30 p.m. PT work?

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**From:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>

**Sent:** Wednesday, May 8, 2024 2:23 PM

**To:** Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[cleee@leesheikh.com](mailto:cleee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S.



<[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

**External Email**

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Counsel:

MPH's request that Apple specifically identify any alleged improprieties in MPH's objections and responses, and provide authority in support, sought Apple's substantive bases so that MPH could meaningfully analyze them (and Apple's authority, if any) and adequately prepare in advance of any meet-and-confer. Apple's conclusory statements that its requests "are appropriate" and that MPH's objections and responses "are not proper" fail to articulate the bases of any alleged improprieties, nor even any substantive preview. Apple's refusal to do so is particularly troubling in view of the parties' April 22 meet-and-confer, where Apple likewise did not make a good faith effort to resolve any alleged dispute, providing little or no information about why it contended that MPH's discovery responses were deficient and rushing to declare impasses when MPH sought explanations. MPH intends to inform the Court of Apple's unwillingness to engage in discovery dispute resolution in good faith if Apple continues to hold back information both before, and at, meet and confers, depriving the parties of meaning opportunity to resolve the issues. Far too often, MPH sees Apple's explanations for the first time in the draft or final discovery dispute letters, after expending time and resources on meet-and-confers that were unproductive due to Apple's withholding of information. This multiplies the process by requiring the parties to turn multiple drafts of the discovery dispute letters, or in some cases resolve an issue at the last minute (after expending resources on it) only under threat of a filed letter motion.

In view of the foregoing, MPH repeats its request that Apple provide its positions and any authority so MPH can analyze and attempt to resolve any legitimate concerns. MPH also believes that a viable search term proposal from Apple would significantly advance the parties' discovery discussions. If Apple refuses to provide an updated proposal, please explain prior to any meet-and-confer why Apple believes its proposed search terms are appropriate, considering they are explicitly in violation of the Order re Discovery of ESI. Dkt. 88, ¶11.

Thank you,

**Dan Gjorgiev**

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---

**From:** Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>

**Sent:** Tuesday, May 7, 2024 6:00 PM



**To:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[cleee@leesheikh.com](mailto:cleee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>  
**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>  
**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

Dan,

MPH has not agreed to produce the full scope of emails requested by any of Apple's email RFPs. Accordingly, Apple would like to meet and confer on every email RFP and every objection raised by MPH (including MPH's objections to Apple's search terms and custodians). Apple's position is that the search terms and custodians we already provided are appropriate. We're available for a meet and confer during the following time windows: Wednesday from 10:30 a.m. to 11:30 a.m. PT and 1 p.m. to 3 p.m. PT; and Thursday at 9:30 a.m. to 1:30 p.m. PT. Please let us know your availability in those time windows.

Regards,

Ryan

---

**From:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>  
**Sent:** Tuesday, May 7, 2024 3:24 PM  
**To:** Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[cleee@leesheikh.com](mailto:cleee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>  
**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>  
**Subject:** [EXT] RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

Counsel,

MPH requests that Apple specifically identify any alleged improprieties in MPH's objections and responses and provide authority in support, if any, so that MPH can assess Apple's positions prior to any meet-and-confer and respond appropriately. The parties can subsequently have a meaningful meet-and-confer, if one becomes necessary, to address any legitimate issues raised by Apple. We do not believe that Apple's preference of identifying alleged improprieties for the first time during a meet-and-confer is an efficient use of the parties' time and resources. Relatedly, MPH's May 3, 2024 objections and responses did not propose that the parties meet and confer, as Apple's objections and responses frequently do.

Notably, MPH has yet to receive an updated search term proposal from Apple with respect to its Second Set of Email RFPs, which is not narrowly tailored to particular issues, as required by the Order re Discovery of ESI. Dkt. 88, ¶11. Such a proposal should take into account the parties' previous agreement on the four search terms for Apple's First Set of Email RFPs and the overall limit of "a total of five search terms per custodian per party." *Id.*

Thank you,

**Dan Gjorgiev**

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---

**From:** Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>

**Sent:** Friday, May 3, 2024 7:49 PM

**To:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>; Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

Counsel,

MPH's objections and non-responses to all of Apple's second set of email RFPs (Nos. 5-16) are not proper. Please let us know your availability to meet and confer next Tuesday 5/7 or Wednesday 5/8 regarding MPH's objections/responses.

Thank you,

**Nima Kiaei**

Associate

[nkiaei@mofo.com](mailto:nkiaei@mofo.com)

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<image001.png>

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---

**From:** Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>

**Sent:** Friday, May 3, 2024 3:23 PM

**To:** Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>; Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; [ppeden@bwsllaw.com](mailto:ppeden@bwsllaw.com); David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>;



Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** RE: MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

**External Email**

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Counsel,

Please find attached MPH's Objections and Responses to Apple's Second Set of Email RFPs (Nos. 5-16).

Best,

**Dan Gjorgiev**

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---

**From:** Specht, Silvia T. <[SSpecht@mofo.com](mailto:SSpecht@mofo.com)>

**Sent:** Wednesday, April 3, 2024 8:31 PM

**To:** Ashley LaValley <[alavalley@leesheikh.com](mailto:alavalley@leesheikh.com)>; Christopher Lee <[cle@leesheikh.com](mailto:cle@leesheikh.com)>; Brian Haan <[bhaan@leesheikh.com](mailto:bhaan@leesheikh.com)>; Dan Gjorgiev <[dgjorgiev@leesheikh.com](mailto:dgjorgiev@leesheikh.com)>; James Mitchell <[jmitchell@leesheikh.com](mailto:jmitchell@leesheikh.com)>; ppeden@bwsllaw.com; David Sheikh <[dsheikh@leesheikh.com](mailto:dsheikh@leesheikh.com)>

**Cc:** Rahebi, Bitra <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Hung, Richard S. J. <[RHung@mofo.com](mailto:RHung@mofo.com)>; Lee, Rose S.

<[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; Malloy, Ryan J. <[RMalloy@mofo.com](mailto:RMalloy@mofo.com)>; Kiaei, Nima I. <[NKiaei@mofo.com](mailto:NKiaei@mofo.com)>;

Park, Soo J. <[SPark@mofo.com](mailto:SPark@mofo.com)>

**Subject:** MPH Technologies Oy v. Apple Inc., Case No. 18-cv-05935: Service - Discovery

Counsel -

Attached for service is Defendant Apple Inc.'s Second Set of Requests for Production of E-Mail to Plaintiff MPH Technologies Oy (Nos. 5-16).

Thank you.

**Silvia Specht**

Paralegal Supervisor

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